

EXHIBIT J

RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

Kathryn Sadasivan <ksadasivan@naacpldf.org>

Wed 10/5/2022 5:21 PM

To: Gore, John M. <jmgore@jonesday.com>; Elena Rodriguez Armenta <erodriguezarmenta@elias.law>; Roberts, Charles E. <cetroberts@jonesday.com>;

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Dear John,

Thank you for your email response on October 3, 2022, to Plaintiffs' request to meet and confer to discuss GOP Intervenors' anticipated production of documents responsive to consolidated Plaintiffs' Requests for Production and Interrogatories and particularly your broad claims of privilege. We understand that you are declining to meet and confer with us this week because of your trial schedule. As you note, the Court's scheduling order contemplates accommodating counsel's trial schedules; however, the scheduling order also specifically provides that October 24, 2022 is the last day of discovery for matters related to the primary elections as to the GOP Intervenors. The close of that phase of discovery is now less than three weeks away, and the GOP Intervenors have not produced any responsive documents. Indeed, you have not shared your proposed search terms with us, nor have you identified all relevant custodians nor explicated your broad claims of privilege for which you plan to withhold documents and possibly a privilege log.

Given your scheduling conflicts and the time you appear to need to get your searches underway, assess the documents in your possession, and evaluate claims of privilege, we ask that you file an unopposed motion to amend the current scheduling order, changing the close of discovery as to matters related to the primary elections from October 24, 2022 to March 17, 2023, the date for completion of fact discovery as to matters related to the general election, noting that the discovery to be given going forward by the GOP Intervenors will now include the general election as well as all previous topics. We believe that proceeding in this manner will allow a more efficient, effective, and streamlined discovery process as to GOP intervenors.

Of course, we were planning, under the current deadline, to depose a number of individuals employed by the GOP intervenors during the coming weeks. Given your non-compliance with discovery to date, and your communication on October 3, 2022, please let us know as soon as possible when you will file the motion to amend the scheduling order. Relatedly, do you anticipate defending the depositions of Melissa Conway, Alan Vera, Cindy Siegel, Susan Fountain, and Byron Fisher in their individual capacities? We plan to notice the 30(b)(1) depositions of these and possibly other individuals within GOP Intervenors' organizations. Are you willing to accept service of process, electronically, on behalf of these individuals?

Thank you for your prompt response.

Sincerely,

Kathryn Sadasivan
Redistricting Counsel, NAACP Legal Defense and Educational Fund

From: Gore, John M. <jmgore@jonesday.com>

Sent: Monday, October 3, 2022 10:15 PM

To: Kathryn Sadasivan <ksadasivan@naacpldf.org>; Elena Rodriguez Armenta <erodriguezarmenta@elias.law>; Roberts, Charles E. <cetroberts@jonesday.com>

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Subject: RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

[Caution: EXTERNAL EMAIL]

Kathryn:

We have received your letter.

Since you received my September 23 email, you are aware that I am in trial in another matter for the next two weeks. The Court's discovery schedule specifically contemplated accommodating the various counsel's trial schedules on other matters this fall.

Moreover, your request for a meet-and-confer regarding privilege issues is premature for the reasons we already have explained. We are still working on your prior requests to identify the remaining custodians and search terms. Resolving those issues will obviously affect the scope and scale of our document review, as well as of the privilege issues implicated by your broad requests. We will be in a more informed position to engage with you on privilege issues at that point.

Thanks,
John

John M. Gore
Partner

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From: Kathryn Sadasivan <ksadasivan@naacpldf.org>

Sent: Monday, October 3, 2022 9:09 AM

To: Gore, John M. <jmgore@jonesday.com>; Elena Rodriguez Armenta <erodriguezarmenta@elias.law>; Roberts, Charles E. <cetroberts@jonesday.com>

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Subject: RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

**** External mail ****

Dear John,

We have received your email on September 23 and your letter dated August 29. We write to follow up on and better understand GOP Intervenors' claims of privilege in this matter. To do so, we think it appropriate to conduct another meet and confer this week, the week of October 3, 2022. As you know, the scheduling order contemplates the deadline for completion of discovery on matters related to the primary election as to Intervenors on October 24, 2022.

GOP Intervenors' have articulated general objections to producing documents based on legislative privilege, First Amendment associational privilege, and other privileges but have not objected to any specific request for production of documents based on a claim of privilege. This makes any failure to produce a privilege log particularly inappropriate. In our initial meet and confer on August 11, as well as in Plaintiffs' August 19 correspondence, Plaintiffs expressed specific concern over the GOP Intervenors' privilege-related objections. In the August 11 meet and confer, GOP Intervenors explained that because you were in the early stages of document collection and review, you were not aware of how voluminous the documents withheld under claims of privilege would be, but indicated that you anticipated many First Amendment privilege claims in particular. GOP intervenors' letter dated August 29 stated that "Intervenors do not yet know the size or scope of the document collection or the extent to which potentially responsive documents might implicate First Amendment or other privileges." In GOP Intervenors' September 23 correspondence, you again noted that GOP Intervenors "are still collecting and reviewing documents" and remain "unable to determine at this juncture whether the existing protective orders are adequate to protect our clients' interests." Plaintiffs served their requests for production on GOP Intervenors on June 1, 2022, approximately four months ago.

GOP Intervenors have thus far failed to clarify your position with respect to the general objections on the basis of privilege and to the production of a privilege log. Plaintiffs reiterate the requirement of an opportunity to assess these privilege claims on a document-by-document basis, as required by Federal Rule of Civil Procedure Rule 26(b) and the ESI Order entered in this case.

Intervenors' delay in assessing claims of privilege will almost certainly result in discovery delays. Given the already lengthy delays on the part of GOP Intervenors, we request a meet and confer this week, possibly either October 6 or 7, 2022, to avoid the time, costs, and delays associated with unnecessary discovery motions.

Regards,
Kathryn Sadasivan
Redistricting Counsel, NAACP Legal Defense and Educational Fund

From: Gore, John M. <jmgore@jonesday.com>

Sent: Friday, September 23, 2022 4:47 PM

To: Elena Rodriguez Armenta <erodriguezarmenta@elias.law>; Roberts, Charles E. <cetroberts@jonesday.com>

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Jones <mjones@elias.law>; Marcos Mocine-McQueen <mmcqueen@elias.law>; Noah Baron <nbaron@elias.law>; johnhardin@perkinscoie.com; Zachary TX <zachary@texascivilrightsproject.org>; S Chen <schen@texascivilrightsproject.org>; hani@texascivilrightsproject.org; Chris TX <chris@texascivilrightsproject.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; aharris@aclutx.org; tbuser-clancy@aclutx.org; skumar@aclutx.org; A Trepp <atrepp@jenner.com>; ldavis@drtx.org; lromano@drtx.org; mmcnair@drtx.org; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; asavitzky@aclu.org; Franolich, Jackie <jackie.franolich@stoel.com>; elijah.watkins@stoel.com; Prowant, Bradley R. <bradley.prowant@stoel.com>; laura.rosenbaum@stoel.com; Bieter, Mark L. <mark.bieter@stoel.com>; chostetler@freespeechforpeople.org; Jennifer A. Holmes <jholmes@naacpldf.org>; Dahl Rich <dahlrich@reedsmith.com>; Dulaney Pippin, Keely <kpippin@reedsmith.com>; Shira Wakschlag <Wakschlag@TheArc.org>; Tolbert, James E. <JTolbert@reedsmith.com>; Kenneth E. Broughton <KBroughton@ReedSmith.com>; Lang, Daniel H. <DLang@reedsmith.com>; lisa.cubriel@bexar.org; maryann.ortegon@bexar.org; Angela Igrisan <Angela.Igrisan@dallascounty.org>; Kim Barr <Kim.Barr@dallascounty.org>; christine@statesuniteddemocracy.org; marina@statesuniteddemocracy.org; ranjana@statesuniteddemocracy.org; robert@statesuniteddemocracy.org; khartnett@cooley.com; mejiab@cooley.com; oarmon@cooley.com; dlouk@cooley.com; kspector@cooley.com; ssong@cooley.com; ghabell@cooley.com; clebel@cooley.com; nmatteo@cooley.com; sameer.birring@cao.hctx.net; tiffany.bingham@cao.hctx.net; jonathan.fombonne@cao.hctx.net; Christina Beeler <christina.beeler@cao.hctx.net>; jacqueline.bauerband@cao.hctx.net; eric.nichols@butlersnow.com; karson.thompson@butlersnow.com; victoria.filoso@butlersnow.com; leigh.tognetti@da.co.hidalgo.tx.us; josephine.ramirez <josephine.ramirez@da.co.hidalgo.tx.us>; Sherine Thomas <Sherine.Thomas@traviscountytx.gov>; Leslie Dippel <Leslie.Dippel@traviscountytx.gov>; Patrick Pope <Patrick.Pope@traviscountytx.gov>; Gabe Hodge <Gabe.Hodge@traviscountytx.gov>; Meera Aiyer <Meera.Aiyer@traviscountytx.gov>; Crosland, Stewart <scrosland@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Victor Genecin <vgenecin@naacpldf.org>; Jason Schuette <Jason.Schuette@dallascounty.org>; Ben Stool <Ben.Stool@dallascounty.org>; michaelj.garza@da.co.hidalgo.tx.us; liz.ryan@weil.com; Chris Dodge <cdodge@elias.law>; lsnead@drtx.org; umittal@jenner.com; S Cai <scai@jenner.com>; jamunson@jenner.com; Samantha Osaki <sosaki@aclu.org>; Susan Mizner <smizner@aclu.org>; wendy.olson@stoel.com; Kathryn Sadasivan <ksadasivan@naacpldf.org>; Amir Badat <abadat@naacpldf.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Aaron Barnes <Aaron.Barnes@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Jacqueline Villarreal <jacqueline.villarreal@da.co.hidalgo.tx.us>; Tony Nelson <Tony.Nelson@traviscountytx.gov>; Daniela Lorenzo <dlorenzo@elias.law>

Subject: RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

[Caution: EXTERNAL EMAIL]

Elena:

Thanks for following up. We note that the Fifth Circuit has stayed all discovery in these matters until September 29. Nonetheless, we are happy to provide you an update on our discovery efforts.

This is the first time we are hearing of any issues with our interrogatory responses, which we served on August 12. As you note, 6 of our responses to your 10 interrogatories indicate that we will identify documents responsive to those interrogatories. Those responses are appropriate: the interrogatories specifically asked us to “[i]dentify (including by Bates number if or once assigned)” any such documents.

In any event, our August 29 letter already identified custodians for 4 of the 5 GOP intervenors. We have begun collecting documents from all 5 intervenors and loading them into our review platform. We expect be in a position shortly after the stay expires to provide you dates certain for identifying custodians for the remaining intervenor and for sharing our search terms.

As we mentioned in our August 29 letter, we are not yet in an informed position to accept or decline Plaintiffs’ proposal regarding the existing protective orders because we are still collecting and reviewing documents. We therefore are unable

to determine at this juncture whether the existing protective orders are adequate to protect our clients' interests. As we promised, we will inform you of our position on that proposal as soon as we are able to do so.

Finally, like many members of your team, our team is heading to trial in another matter over the next several weeks. The discovery schedule in this case already contemplates all parties' counsel's conflicting trial schedules.

Please let us know if you would like to discuss this further.

Thanks,
John

John M. Gore
Partner

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From: Elena Rodriguez Armenta <erodriguezarmenta@elias.law>

Sent: Monday, September 19, 2022 12:16 PM

To: Roberts, Charles E. <cetroberts@jonesday.com>

Cc: Georgina Yeomans <gyeomans@naacpldf.org>; Jasleen Singh <singhj@brennan.law.nyu.edu>; Gore, John M. <jmgore@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Crosland, Stewart <scrosland@jonesday.com>; Barbara Nicholas <Barbara.Nicholas@dallascounty.org>; daniel.freeman@usdoj.gov; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; michael.stewart3@usdoj.gov; jennifer.yun@usdoj.gov; dana.paikowsky@usdoj.gov; Tiffani Soo-Tim <Tiffani.Soo-Tim@usdoj.gov>; Lauren Putnam <Lauren.Putnam@usdoj.gov>; Sean Morales-Doyle <morales-doyles@brennan.law.nyu.edu>; Patrick Berry <berryp@brennan.law.nyu.edu>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; William Wilder <wilderw@brennan.law.nyu.edu>; Megan Cloud <Megan.Cloud@weil.com>; samantha.smith@weil.com; nperales <nperales@MALDEF.org>; Jlongoria@MALDEF.org; Keats, Michael <michael.keats@friedfrank.com>; Williams, Breanna <breanna.williams@friedfrank.com>; kevin.zhen@friedfrank.com; Jason Kanterman <Jason.Kanterman@friedfrank.com>; Martin, Rebecca <rebecca.martin@friedfrank.com>; Uzoma Nkwonta <unkwonta@elias.law>; Graham White <gwhite@elias.law>; Mike Jones <mjones@elias.law>; Marcos Mocine-McQueen <mmcqueen@elias.law>; Noah Baron <nbaron@elias.law>; johnhardin@perkinscoie.com; Zachary TX <zachary@texascivilrightsproject.org>; S Chen <schen@texascivilrightsproject.org>; hani@texascivilrightsproject.org; Chris TX <chris@texascivilrightsproject.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; aharris@aclutx.org; tbusser-clancy@aclutx.org; skumar@aclutx.org; A Trepp <atrepp@jenner.com>; ldavis@drtx.org; lromano@drtx.org; mmcnair@drtx.org; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; asavitzky@aclu.org; Franolich, Jackie <jackie.franolich@stoel.com>; elijah.watkins@stoel.com; Prowant, Bradley R. <bradley.prowant@stoel.com>; laura.rosenbaum@stoel.com; Bieter, Mark L. <mark.bieter@stoel.com>; chostetler@freespeechforpeople.org; Jennifer A. Holmes <jholmes@naacpldf.org>; R. Gary Spencer <gspencer@naacpldf.org>; Dahl Rich <dahlrich@reedsmith.com>; Dulaney Pippin, Keely <kpippin@reedsmith.com>; Shira Wakschlag <Wakschlag@TheArc.org>; Tolbert, James E. <JTolbert@reedsmith.com>; Kenneth E. Broughton <KBroughton@ReedSmith.com>; Lang, Daniel H. <DLang@reedsmith.com>; lisa.cubriel@bexar.org; maryann.ortegon@bexar.org; Angela Igrisan <Angela.Igrisan@dallascounty.org>; Kim Barr <Kim.Barr@dallascounty.org>; christine@statesuniteddemocracy.org; marina@statesuniteddemocracy.org; ranjana@statesuniteddemocracy.org; robert@statesuniteddemocracy.org; khartnett@cooley.com; mejiab@cooley.com; oarmon@cooley.com; dlouk@cooley.com; kspector@cooley.com; ssong@cooley.com; ghabell@cooley.com; clebel@cooley.com; nmatteo@cooley.com; sameer.birring@cao.hctx.net; tiffany.bingham@cao.hctx.net; jonathan.fombonne@cao.hctx.net; Christina Beeler <christina.beeler@cao.hctx.net>; jacqueline.bauerband@cao.hctx.net; eric.nichols@butlersnow.com; karson.thompson@butlersnow.com; victoria.filoso@butlersnow.com; leigh.tognetti@da.co.hidalgo.tx.us; josephine.ramirez <josephine.ramirez@da.co.hidalgo.tx.us>; Sherine Thomas <Sherine.Thomas@traviscountytexas.gov>; Leslie Dippel <Leslie.Dippel@traviscountytexas.gov>; Patrick Pope <Patrick.Pope@traviscountytexas.gov>; Gabe Hodge

<Gabe.Hodge@traviscountytx.gov>; Meera Aiyer <Meera.Aiyer@traviscountytx.gov>; Crosland, Stewart <scrosland@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Victor Genecin <vgenecin@naacpldf.org>; Jason Schuette <Jason.Schuette@dallascounty.org>; Ben Stool <Ben.Stool@dallascounty.org>; michaelj.garza@da.co.hidalgo.tx.us; liz.ryan@weil.com; Chris Dodge <cdodge@elias.law>; lsnead@drtx.org; umittal@jenner.com; S Cai <scai@jenner.com>; jamunson@jenner.com; Samantha Osaki <sosaki@aclu.org>; Susan Mizner <smizner@aclu.org>; wendy.olson@stoel.com; Kathryn Sadasivan <ksadasivan@naacpldf.org>; Amir Badat <abadat@naacpldf.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Aaron Barnes <Aaron.Barnes@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Jacqueline Villarreal <jacqueline.villarreal@da.co.hidalgo.tx.us>; Tony Nelson <Tony.Nelson@traviscountytx.gov>; Daniela Lorenzo <dlorenzo@elias.law>

Subject: RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

**** External mail ****

Counsel,

We are in receipt of your August 29 letter concerning document production and your August 12 Responses and Objections to Plaintiffs' First Set of Interrogatories. We write to better understand the status of the GOP Intervenors' collection and review of documents in this matter.

Plaintiffs first served requests for production on the GOP Intervenors over two months ago. Nonetheless, your correspondence reflects that the GOP Intervenors' collection and review of documents remains at a very preliminary stage and that you have not yet collected documents from your clients, never mind begun producing any documents in response to our two-month-old requests. At the same time, your responses to our First Set of Interrogatories reflect that you intend to address most of our interrogatories by identifying documents that have not been produced to us.

To keep discovery moving forward, please provide us this week with dates certain for when you will provide proposed custodians for each GOP Intervenor and proposed search terms for collecting documents from these custodians. Please also indicate whether GOP Intervenors intend to accept or decline Plaintiffs' proposal regarding the existing protective orders.

We are glad to make ourselves available to discuss any of these issues.

Best regards,

Elena

Elena Rodriguez Armenta (she/her)

Litigation Associate*

[Elias Law Group LLP](#)

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*Admitted in New York only. Pending approval of application for admission to D.C. Bar. Practice supervised by D.C. Bar members.

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From: Roberts, Charles E. <cetroberts@jonesday.com>

Sent: Monday, August 29, 2022 5:10 PM

To: Elena Rodriguez Armenta <erodriguezarmenta@elias.law>
Cc: Georgina Yeomans <gyeomans@naacpldf.org>; Jasleen Singh <singhj@brennan.law.nyu.edu>; Gore, John M. <jmgore@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Crosland, Stewart <scrosland@jonesday.com>; Barbara Nicholas <Barbara.Nicholas@dallascounty.org>; daniel.freeman@usdoj.gov; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; michael.stewart3@usdoj.gov; jennifer.yun@usdoj.gov; dana.paikowsky@usdoj.gov; Tiffani Soo-Tim <Tiffani.Soo-Tim@usdoj.gov>; Lauren Putnam <Lauren.Putnam@usdoj.gov>; Sean Morales-Doyle <morales-doyles@brennan.law.nyu.edu>; Patrick Berry <berryp@brennan.law.nyu.edu>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; William Wilder <wilderw@brennan.law.nyu.edu>; Megan Cloud <Megan.Cloud@weil.com>; samantha.smith@weil.com; nperales <nperales@MALDEF.org>; Jlongoria@MALDEF.org; Keats, Michael <michael.keats@friedfrank.com>; Williams, Breanna <breanna.williams@friedfrank.com>; kevin.zhen@friedfrank.com; Jason Kanterman <Jason.Kanterman@friedfrank.com>; Martin, Rebecca <rebecca.martin@friedfrank.com>; Uzoma Nkwonta <unkwonta@elias.law>; Graham White <gwhite@elias.law>; Mike Jones <mjones@elias.law>; Marcos Mocine-McQueen <mmcqueen@elias.law>; Noah Baron <nbaron@elias.law>; johnhardin@perkinscoie.com; Zachary TX <zachary@texascivilrightsproject.org>; S Chen <schen@texascivilrightsproject.org>; hani@texascivilrightsproject.org; Chris TX <chris@texascivilrightsproject.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; aharris@aclutx.org; tbusser-clancy@aclutx.org; skumar@aclutx.org; A Trepp <atrepp@jenner.com>; ldavis@drtx.org; lromano@drtx.org; mmcnair@drtx.org; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; asavitzky@aclu.org; Franolich, Jackie <jackie.franolich@stoel.com>; elijah.watkins@stoel.com; Prowant, Bradley R. <bradley.prowant@stoel.com>; laura.rosenbaum@stoel.com; Bieter, Mark L. <mark.bieter@stoel.com>; chostetler@freespeechforpeople.org; Jennifer A. Holmes <jholmes@naacpldf.org>; R. Gary Spencer <gspencer@naacpldf.org>; Dahl Rich <dahlrich@reedsmith.com>; Dulaney Pippin, Keely <kpippin@reedsmith.com>; Shira Wakschlag <Wakschlag@TheArc.org>; Tolbert, James E. <JTolbert@reedsmith.com>; Kenneth E. Broughton <KBroughton@ReedSmith.com>; Lang, Daniel H. <DLang@reedsmith.com>; lisa.cubriel@bexar.org; maryann.ortegon@bexar.org; Angela Igrisan <Angela.Igrisan@dallascounty.org>; Kim Barr <Kim.Barr@dallascounty.org>; christine@statesuniteddemocracy.org; marina@statesuniteddemocracy.org; ranjana@statesuniteddemocracy.org; robert@statesuniteddemocracy.org; khartnett@cooley.com; mejiab@cooley.com; oarmon@cooley.com; dlouk@cooley.com; kspector@cooley.com; ssong@cooley.com; ghabell@cooley.com; clebel@cooley.com; nmatteo@cooley.com; sameer.birring@cao.hctx.net; tiffany.bingham@cao.hctx.net; jonathan.fombonne@cao.hctx.net; Christina Beeler <christina.beeler@cao.hctx.net>; jacqueline.bauerband@cao.hctx.net; eric.nichols@butlersnow.com; karson.thompson@butlersnow.com; victoria.filoso@butlersnow.com; leigh.tognetti@da.co.hidalgo.tx.us; josephine.ramirez <josephine.ramirez@da.co.hidalgo.tx.us>; Sherine Thomas <Sherine.Thomas@traviscountytexas.gov>; Leslie Dippel <Leslie.Dippel@traviscountytexas.gov>; Patrick Pope <Patrick.Pope@traviscountytexas.gov>; Gabe Hodge <Gabe.Hodge@traviscountytexas.gov>; Meera Aiyer <Meera.Aiyer@traviscountytexas.gov>; Crosland, Stewart <scrosland@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Victor Genecin <vgenecin@naacpldf.org>; Jason Schuette <Jason.Schuette@dallascounty.org>; Ben Stool <Ben.Stool@dallascounty.org>; michaelj.garza@da.co.hidalgo.tx.us; liz.ryan@weil.com; Chris Dodge <cdodge@elias.law>; lsnead@drtx.org; umittal@jenner.com; S Cai <scail@jenner.com>; jamunson@jenner.com; Samantha Osaki <sosaki@aclu.org>; Susan Mizner <smizner@aclu.org>; wendy.olson@stoel.com; Kathryn Sadasivan <ksadasivan@naacpldf.org>; Amir Badat <abadat@naacpldf.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Aaron Barnes <Aaron.Barnes@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Jacqueline Villarreal <jacqueline.villarreal@da.co.hidalgo.tx.us>; Tony Nelson <Tony.Nelson@traviscountytexas.gov>; Daniela Lorenzo <dlorenzo@elias.law>

Subject: RE: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

Counsel,

Attached please find discovery correspondence regarding the meet and confer held on August 11, 2022. Please let us know if you would like to discuss.

Best,
 Chuck

--

Chuck Roberts

Associate

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From: Elena Rodriguez Armenta <erodriguezarmenta@elias.law>**Sent:** Friday, August 19, 2022 9:26 PM**To:** Gore, John M. <jmgore@jonesday.com>

Cc: Georgina Yeomans <gyeomans@naacpldf.org>; Roberts, Charles E. <cetroberts@jonesday.com>; Jasleen Singh <singhj@brennan.law.nyu.edu>; Kenny, Stephen J. <skenny@jonesday.com>; Crosland, Stewart <scrosland@jonesday.com>; Barbara Nicholas <Barbara.Nicholas@dallascounty.org>; daniel.freeman@usdoj.gov; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; michael.stewart3@usdoj.gov; jennifer.yun@usdoj.gov; dana.paikowsky@usdoj.gov; Tiffani Soo-Tim <Tiffani.Soo-Tim@usdoj.gov>; Lauren Putnam <Lauren.Putnam@usdoj.gov>; Sean Morales-Doyle <morales-doyles@brennan.law.nyu.edu>; Patrick Berry <berryp@brennan.law.nyu.edu>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; William Wilder <wilderw@brennan.law.nyu.edu>; Megan Cloud <Megan.Cloud@weil.com>; samantha.smith@weil.com; nperales <nperales@MALDEF.org>; jlongoria@MALDEF.org; Keats, Michael <michael.keats@friedfrank.com>; Williams, Breanna <breanna.williams@friedfrank.com>; kevin.zhen@friedfrank.com; Jason Kanterman <Jason.Kanterman@friedfrank.com>; Martin, Rebecca <rebecca.martin@friedfrank.com>; Uzoma Nkwonta <unkwonta@elias.law>; Graham White <gwhite@elias.law>; Mike Jones <mjones@elias.law>; Marcos Mocine-McQueen <mmcqueen@elias.law>; Noah Baron <nbaron@elias.law>; johnhardin@perkinscoie.com; Zachary TX <zachary@texascivilrightsproject.org>; S Chen <schen@texascivilrightsproject.org>; hani@texascivilrightsproject.org; Chris TX <chris@texascivilrightsproject.org>; Jerry Vattamala <jvattamala@aaldef.org>; Susana Lorenzo-Giguere <slorenzo-giguere@aaldef.org>; Patrick Stegemoeller <pstegemoeller@aaldef.org>; aharris@aclutx.org; tbusser-clancy@aclutx.org; skumar@aclutx.org; A Trepp <atrepp@jenner.com>; ldavis@drtx.org; lromano@drtx.org; mmcnair@drtx.org; Adriel I. Cepeda Derieux <ACepedaDerieux@aclu.org>; asavitzky@aclu.org; Franolich, Jackie <jackie.franolich@stoel.com>; elijah.watkins@stoel.com; Prowant, Bradley R. <bradley.prowant@stoel.com>; laura.rosenbaum@stoel.com; Bieter, Mark L. <mark.bieter@stoel.com>; chostetler@freespeechforpeople.org; Jennifer A. Holmes <jholmes@naacpldf.org>; R. Gary Spencer <gspencer@naacpldf.org>; Dahl Rich <dahlrich@reedsmith.com>; Dulaney Pippin, Keely <kpippin@reedsmith.com>; Shira Wakschlag <Wakschlag@TheArc.org>; Tolbert, James E. <JTolbert@reedsmith.com>; Kenneth E. Broughton <KBroughton@ReedSmith.com>; Lang, Daniel H. <DLang@reedsmith.com>; lisa.cubriel@bexar.org; maryann.ortegon@bexar.org; Angela Igrisan <Angela.Igrisan@dallascounty.org>; Kim Barr <Kim.Barr@dallascounty.org>; christine@statesuniteddemocracy.org; marina@statesuniteddemocracy.org; ranjana@statesuniteddemocracy.org; robert@statesuniteddemocracy.org; khartnett@cooley.com; mejia@cooley.com; oarmon@cooley.com; dlouk@cooley.com; kspector@cooley.com; ssong@cooley.com; ghabell@cooley.com; clebel@cooley.com; nmatteo@cooley.com; sameer.birring@cao.hctx.net; tiffany.bingham@cao.hctx.net; jonathan.fombonne@cao.hctx.net; Christina Beeler <christina.beeler@cao.hctx.net>; jacqueline.bauerband@cao.hctx.net; eric.nichols@butlersnow.com; karson.thompson@butlersnow.com; victoria.filoso@butlersnow.com; leigh.tognetti@da.co.hidalgo.tx.us; josephine.ramirez <josephine.ramirez@da.co.hidalgo.tx.us>; Sherine Thomas <Sherine.Thomas@traviscountytexas.gov>; Leslie Dippel <Leslie.Dippel@traviscountytexas.gov>; Patrick Pope <Patrick.Pope@traviscountytexas.gov>; Gabe Hodge <Gabe.Hodge@traviscountytexas.gov>; Meera Aiyer <Meera.Aiyer@traviscountytexas.gov>; Crosland, Stewart <scrosland@jonesday.com>; Kenny, Stephen J. <skenny@jonesday.com>; Victor Genecin <vgenecin@naacpldf.org>; Jason Schuette <Jason.Schuette@dallascounty.org>; Ben Stool <Ben.Stool@dallascounty.org>; michaelj.garza@da.co.hidalgo.tx.us; liz.ryan@weil.com; Chris Dodge <cdodge@elias.law>; lsnead@drtx.org; umittal@jenner.com; S Cai <scai@jenner.com>; jamunson@jenner.com; Samantha Osaki <sosaki@aclu.org>; Susan Mizner <smizner@aclu.org>; wendy.olson@stoel.com; Kathryn Sadasivan <ksadasivan@naacpldf.org>; Amir Badat <abadat@naacpldf.org>; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>; Aaron Barnes <Aaron.Barnes@oag.texas.gov>; Zachary Berg <Zachary.Berg@oag.texas.gov>; Ari Herbert <Ari.Herbert@oag.texas.gov>; Jacqueline Villarreal

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Subject: LUPE v. Abbott, 5:21-cv-844 (WD Tex): Discovery Correspondence - M&C (Intervenor-Defendants)

**** External mail ****

Counsel,

Attached please find discovery correspondence memorializing the meet and confer held on August 11, 2022, regarding GOP Intervenor's Responses and Objections to Plaintiffs' First Set of Requests for Production. Please let us know if you would like to discuss.

All the best,

Elena

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